



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

JUN 20 2012

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

**Article Number:** 7011 2970 0003 2009 0087

Mr. Robert Cornez  
Project Manager, Environmental Remediation  
El Paso Corporation  
2 N. Nevada, #717  
Colorado Springs, Colorado 80903

**Re: Approval for Cleanup and Disposal of PCB Remediation Waste under 40 CFR §761.61(a), for Characterization and Verification Sampling under 40 CFR §761.61(c), and for Alternate Decontamination and Sampling under 40 CFR §761.79(h)**

Dear Mr. Cornez:

This is in response to the April 26, 2012 self-implementing notification (Notification), prepared by El Paso Corporation (El Paso) for the former Nuodex Corporation Site (the "Site") located on Industrial Avenue in Fords, New Jersey. The Notification was amended through submittal of additional information by El Paso in electronic correspondence dated June 1, 2012. These documents will be referred to as the "Application". The Site contains polychlorinated biphenyl (PCB) remediation waste that exceeds the cleanup levels under the federal PCB regulations at 40 CFR §761.61(a)(4).

With the exception of the characterization and verification sampling requirements under Subparts N and O of 40 CFR Part 761, the proposed removal of PCB-remediation waste meets the self-implementing cleanup and disposal requirements under 40 CFR §761.61(a). Based on characterization sampling conducted at the Site, the United States Environmental Protection Agency (EPA) finds that this sampling is acceptable for delineating areas of PCB remediation waste to be addressed. The EPA also finds that El Paso's plan for verification sampling is acceptable for purposes of determining compliance with the unrestricted high occupancy PCB cleanup standard of 1 part per million.

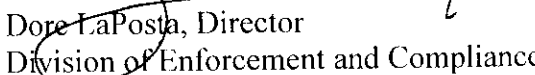
The Application also describes a request for approval, under 40 CFR §761.79(h), of a decontamination standard of 10 micrograms per 100 square centimeters (i.e., the unrestricted use standard for non-porous surfaces previously in contact with liquid PCBs) for decontaminating equipment. The decontamination procedure will consist of a wash using a solution of the commercial product known as CAPSUR (or an EPA-approved equivalent), and then a rinse using a high-pressure, hot water power washer.

Based on the information provided in the Application, EPA finds that the proposed decontamination procedure and standard are acceptable for performing the decontamination activities described above.

EPA is approving El Paso's Application, and El Paso may proceed with the cleanup and disposal under 40 CFR §§761.61(a) and (c), as well as decontamination under 40 CFR §761.79(h), subject to this approval. This approval also constitutes an order under the authority of Section 6 of the Toxic Substances Control Act, 15 U.S.C. § 2605. Please note that this approval does not constitute a determination by EPA that the transporters or disposal facilities selected by El Paso or its consultant(s) are authorized to conduct the activities set forth in the Application. El Paso is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.

Should you have any questions concerning this matter, please contact Mr. James Haklar of my staff at (732) 906-6817, or at [haklar.james@epa.gov](mailto:haklar.james@epa.gov).

Sincerely yours,



Dore LaPosta, Director  
Division of Enforcement and Compliance Assistance

cc: New Jersey Department of Environmental Protection, Bureau of Case Assignment  
and Initial Notice - Program Interest Number G000001659